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September 17, 2015

**Via Facsimile (212-805-6111) and**  
**Via ECF**

The Honorable Henry B. Pitman  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Laydon v. Mizuho Bank, Ltd. et al.*, No. 1:12-cv-03419-GBD  
Request for Extension on Reply Briefing Deadline

Dear Judge Pitman:

We represent the HSBC Defendants in the above-referenced action and write on behalf of all parties. Certain Defendants filed motions to sustain their data privacy law objections under the laws of the United Kingdom on August 6, 2015, along with affidavits of certain experts in support.<sup>1</sup> See ECF Nos. 495, 501. Plaintiff's served requests to depose Defendants' U.K. data privacy law experts. Defendants objected and served a pre-motion letter with the Court, to which the Plaintiff responded. See ECF Nos. 506, 507. The parties wish to inform the Court that based on discussions with the parties, the Plaintiff has now agreed to withdraw his deposition notices, subject to renewal after Plaintiff has had an opportunity to review Defendants' reply. In addition, the Defendants respectfully request a two-day extension from Monday, September 21 to Wednesday, September 23 by which to file their reply on the motion to sustain the data privacy law objections under the laws of the United Kingdom. This is Defendants' first request and Plaintiff consents.

We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in black ink that reads "Gregory T. Casamento".

Gregory T. Casamento

Counsel for HSBC Defendants

cc: All Counsel of Record (by email)

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<sup>1</sup> As the Court is aware, the parties have also reached an agreement on how to address certain Defendants' discovery objections under the data privacy laws of Japan. See ECF No. 511.